

EXHIBIT 208

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiff,

vs.

No. 22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF CECILE DE JONGH was
taken on the 29th day of May, 2021 at the Ritz-Carlton
Hotel, 6900 Great Bay, Nazareth, St. Thomas, U.S. Virgin
Islands, between the hours of 9:02 a.m. and 2:22 p.m.
pursuant to Notice and Federal Rules of Civil Procedure.

Reported by:

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Hill's Reporting Services
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1 government agencies as part of your job?

2 A. Yes.

3 Q. How about Port Authority? Was that one of
4 them?

5 A. I did interact with the Port Authority
6 more so on the latter part because Mr. Epstein wanted
7 a hangar for his helicopter. And -- so, I negotiated
8 the lease with the Port Authority.

9 Q. Okay. Now, there came a time when your
10 husband became governor.

11 A. Yes.

12 Q. That was 2007?

13 A. Yes.

14 Q. And he served two terms?

15 A. Correct.

16 Q. Okay. Did that create any issues given
17 your government-facing role for Mr. Epstein?

18 A. I don't understand the question.

19 Q. Okay. Well, let me ask it to you this way:
20 Did you change how you interacted with the government
21 in any way after you had -- after your husband became
22 governor?

23 A. I don't think so. With the exception of
24 the fact that I would occasionally ask him for
25 direction as to who I should go to. You know, if I

1 had an issue, who should I talk to to get something
2 done.

3 Q. Okay. All right. And did your husband
4 have any process for recusing himself from issues that
5 related to the company you worked for?

6 A. I don't know if he had any process.

7 Q. Okay. You're not aware of any?

8 A. I said I don't know.

9 Q. Okay. You're not aware of him recusing
10 himself from any issue regarding Mr. Epstein?

11 A. I'm not aware of that, no.

12 Q. Okay. All right. Now, when your husband
13 became the governor, did you sort of get a second job
14 result of that as the first lady of the Virgin
15 Islands?

16 A. Yes.

17 Q. And what did that job entail?

18 A. Giving a lot of speeches. I mean, he ran
19 twice. So he ran in 2002 and lost. I was not very
20 involved in that campaign. And between 2002 and
21 2006, you know, right after 2002, we discovered that
22 our youngest son had some serious health issues.

23 So I was very focused on that. We both
24 were. And then he subsequently decided to run in
25 2006, and I was very involved in making sure that our

1 newsworthy at the time. So there was just a lot on
2 my plate.

3 And then I was also very involved in the
4 National Governors Association.

5 THE REPORTER: I'm sorry.

6 THE WITNESS: The National Governors
7 Association, because a lot of the first ladies
8 were involved in mostly of children's
9 activities.

10 And the thing that I chose to do was to --
11 to focus on literacy, because there are many
12 children in the Virgin Islands that didn't
13 have -- when we would do door-to-door, during
14 the campaign, one of the things I discovered
15 that a lot of the household didn't have books in
16 them.

17 So my big project every year was to find
18 a local author and have them write a book and give
19 the books away for free because I didn't want to give
20 toys and I didn't want to give candy.

21 And so we'd have holiday parties and
22 give away the books. So I would raise money during
23 the year for that. And which, you know, took up a
24 lot of time. But I also got a lot of requests for --
25 just give a lot of speeches.

1 Q. And did you have an office as first lady?

2 A. No.

3 Q. Did you have, like, an office address?

4 A. No.

5 Q. Do you have, like, an official Twitter
6 feed?

7 A. Somebody set up a, I think a FaceBook
8 something for me. I'm -- I'm not on -- I'm not on
9 Twitter. I actually don't know how Twitter works.

10 And I know that I had -- I had an email
11 that was set up for me that I never really used
12 because I had to go into the government system and
13 then do something else and something else to get into
14 it. And so I just asked the head of protocol, Raul
15 Carrillo, I said if anything comes in, because it was
16 -- it was the email address that they would give out
17 to people saying, you know, if you want the First
18 Lady to, you know, give a speech or show up
19 somewhere, you know, email her at this email address.

20 And so that was what was done. so I said
21 can you just monitor it and if -- you know, just send
22 me whatever and I'll see whether it fits into my
23 schedule and I would either do it or not do it.

24 Q. Okay. And did you have any staff that
25 helped you in your role as First Lady?

1 A. Well, I had the chief of protocol. But
2 everybody -- all those people worked for Government
3 House. So it was the expectation that if there was a
4 social event -- if there was a social event, I was
5 responsible for it. I found it sometimes very
6 misogynistic.

7 Q. Sure.

8 A. But it was what it was. That if -- you
9 know, if there was going to be sort of an event after
10 the State of the Territory, that I should be pick the
11 caterer, I should do this, you know.

12 And so the chief of protocol had one or
13 two staff members, and so I would have -- you know, I
14 would run over to Government House and say, okay,
15 what are we doing? You know, who are we inviting?
16 And they would sort of handle everything.

17 But they worked for -- they didn't
18 exclusively work for me. They worked for Government
19 House.

20 Q. Got it. All right. Let's look at
21 Exhibit 3.

22 MS. WARREN: Tab 3, Exhibit 1.

23 MR. NEIMAN: Yeah, Tab 3. I will ask
24 the reporter to mark as Exhibit 1 a one-page
25 document.

1 (Deposition Exhibit No. 1 was
2 marked for identification.)

3 Q. (By Mr. Neiman:) All right. Ms. de Jongh,
4 I handed you a one-page document, which is the Twitter
5 printout for ceciledeJongh@firstlady.vi. Do you see
6 that?

7 A. Yes.

8 Q. You recognize that?

9 A. This is a Twitter account?

10 Q. It is.

11 A. Okay. But I never -- these aren't -- this
12 is not something that I typed up.

13 Q. All right. So you can see in the -- at the
14 sort of top half of the page there's a picture; right?

15 A. Yes.

16 Q. That's you?

17 A. That is me.

18 Q. Okay. And it says under that that it's the
19 official Twitter account of U.S. Virgin Islands' First
20 Lady, Cecile de Jongh. Do you see that?

21 A. Em-hmm.

22 Q. And then it indicates that it was joined in
23 September of 2012? You see that?

24 A. Yeah.

25 Q. And that was during the time when you were

1 the first lady?

2 A. Correct.

3 Q. And then there's a bunch of Tweets?

4 A. Right.

5 Q. Do you know who wrote them?

6 A. I don't.

7 Q. Would it had been somebody working for the
8 government?

9 A. It might have been somebody working for
10 the government, yeah.

11 Q. Okay. You didn't hire someone separate
12 from the government to manage this?

13 A. I didn't have money to do that.

14 Q. Sure. Sure. Okay.

15 A. Just -- I mean, there's no office of the
16 first lady with a budget. There was -- there was
17 nothing.

18 Q. Okay. So let's take a look at -- I show
19 you another document which we will mark as Exhibit 2.

20 MR. SCHIFFMAN: Is it possible to share
21 these through chat at the same they're being
22 introduced so that we could -- I'll look at
23 them as well online.

24 MR. NEIMAN: Sure. Okay.

25

1 (Deposition Exhibit No. 2 was
2 marked for identification.)

3 Q. (By Mr. Neiman:) Okay. I placed in front
4 of you, Ms. de Jongh, Exhibit 2, which is a printout
5 from the archives of the internet of the official
6 website of the Governor of the U.S. Virgin Islands.
7 Do you see that?

8 A. Yes. Eh-hmm.

9 Q. And this announces that you had your own
10 website. Do you see that?

11 A. Eh-hmm.

12 Q. Do you recall that?

13 A. I recall that, yeah.

14 MR. SCHIFFMAN: I'm sorry, counsel, was
15 there an answer to that question as to whether
16 documents are going to be shared in the chat?

17 MR. NEIMAN: Yeah. The answer was yes.

18 MR. SCHIFFMAN: Okay. I'm sorry. I
19 just missed it.

20 MR. NEIMAN: And it's in the chat now.

21 Q. (By Mr. Neiman:) Okay. Sorry to
22 interrupt. We were talking about the website. Tell
23 us about the first lady website that was set up.

24 A. That was something I think the P.R., that
25 the governor's P.R. department, John Greaux and his

1 staff put up because I was, you know, I was doing
2 things. So they wanted to put it out there.

3 Q. Right. And you mentioned that you had to
4 give a lot of speeches in this -- in this job. Did
5 you have someone who could write the speeches for you?

6 A. Yeah. Julia, I can't remember her
7 last name, worked in the P.R. department. So a lot
8 of times I would draft something and I would send it
9 to her and say, you know, what are your thoughts.
10 And she would clean it up and send it to me, and
11 that's how it was done.

12 Q. Okay. And Julia was an employee of the
13 government?

14 A. Correct.

15 Q. Okay. And if you look at this little
16 printout, you could see it says, "First Lady Launches
17 Website."

18 A. Eh-hmm.

19 Q. And then in the second paragraph, there's a
20 little quote attributed to you. Do you see that?

21 A. Yes.

22 Q. And it says at the bottom, that "It's
23 important that residents and other interested
24 individuals have access to the ongoing work of the
25 first lady on behalf of all Virgin Islanders."

1 Do you see that?

2 A. Yes.

3 Q. Is that sort of how you saw your role as
4 working on behalf of all the Virgin Islanders?

5 A. Yes.

6 Q. Okay. All right. And you can see that to
7 the left there there's a little box that says "Office
8 of the First Lady."

9 A. Eh-hmm.

10 Q. Do you see that?

11 And then there's a phone number and a --

12 A. I'm sorry, yes.

13 Q. Yeah, she can't write it down unless you
14 say it.

15 A. Yes. I know, yes.

16 Q. Let me just say one other thing, very
17 normal in regular conversation for us to kind of both
18 be talking at the same time?

19 A. I apologize.

20 Q. Super hard for her.

21 A. Yeah.

22 Q. So I will try not to --

23 A. And I will try as well.

24 Q. Great. So you can see in this box it says
25 "Office of the First Lady," and then there's an

1 address listed. Do you see that?

2 A. Eh-hmm. Yes.

3 Q. And that's the address where the governor's
4 office is?

5 A. Correct.

6 Q. Okay. And there's a phone number and a fax
7 number there as well. Do you see that?

8 A. Yes.

9 Q. And who would answer if that phone number
10 was called?

11 A. That's -- that's the same number as
12 Government House.

13 Q. Okay. That's the general switchboard
14 number for Government House?

15 A. Yes.

16 Q. Okay. And would that call find its way to
17 you, eventually?

18 A. Yes. I didn't work at Government House.

19 THE REPORTER: I'm sorry.

20 THE WITNESS: I didn't work at
21 Government House.

22 Q. (By Mr. Neiman:) Okay. So if someone
23 called the number that the website is saying is the
24 number for the office of First Lady, what happens?

25 A. They would probably get Raul Carrillo or

1 A. No.

2 Q. Do you remember a person named [REDACTED]?

3 A. The name I do recognize, yeah.

4 Q. What do you remember about this person,
5 [REDACTED]?

6 A. The thing I remember correctly is there
7 was a [REDACTED] who was, when I was out getting my knee
8 replacement in 2017, I was gone for a while, and I
9 came back, and I think Jeanne told me that there was
10 a [REDACTED] who was going to be working with us. And I
11 said, who? And then -- who -- who worked with us.
12 And by the time I came back, she was off and on the
13 payroll.

14 Q. You mean she had gone on the payroll and
15 then off the payroll?

16 A. Yeah.

17 Q. And you were in New York for, like, two
18 weeks?

19 A. No. I was gone for about a month.

20 Q. About a month.

21 A. Yeah.

22 Q. And am I correct that you stayed in an
23 apartment provided by Mr. Epstein in New York?

24 A. Correct.

25 Q. Did you know anything about the other

1 THE WITNESS: Yes.

2 Q. (By Mr. Neiman:) I know it's hard. At the
3 top, there's an email from you to Mr. Epstein and
4 copied to Mr. Kahn, correct?

5 A. Yes.

6 Q. Okay. And you will see at the bottom
7 Mr. Epstein is asking you something about whether
8 there's an CB5 visa regional center in the V.I. Also,
9 tuition is approved. Do you see that?

10 A. Eh-hmm. Yes.

11 Q. Okay. So what is that -- what is he
12 talking about there, first, with the CB5 visa regional
13 center?

14 A. As I sit here now, I don't know.

15 Q. Okay. And then you will see it also says
16 "Also tuition is approved."

17 Do you see that?

18 A. Yes.

19 Q. What's that talking about?

20 A. That's probably tuition for our kids.

21 Q. And am I correct that Mr. Epstein paid the
22 college tuition of your children.

23 A. Of mine and everybody else who had kids at
24 Financial Trust, yes.

25 Q. Who else's tuitions did he pay other than

1 really can't do anything to influence -- can't do
2 anything or influence Hancock since this the private
3 sector issue. Do you see that?

4 A. Yes.

5 Q. Who is Kenn Hobson?

6 A. I think was the head of VIPA at the time.

7 Q. Got it. And you say, "This is why Kenn
8 gave us a possible alternative."

9 Do you see that?

10 A. Eh-hmm. Yes.

11 Q. What are you referring to there?

12 A. Well, I think that's referring to --

13 Q. To item 2 in the previous email?

14 A. Yeah.

15 Q. Okay. And then you go and say, in the next
16 paragraph of your email, in Exhibit 9, that, "John has
17 said if you get the fuel prices together to show how
18 Hancock is gouging, he can take it to VIPA board.
19 Thoughts on this."

20 Do you see that?

21 A. Yes.

22 Q. So you're bringing up, again, the point you
23 made in the prior email that one way to deal with this
24 issue was to have your husband, the governor, take it
25 to the VIPA board, right?

1 anybody about getting it approved.

2 It was presented, I think, by Mr. Epstein
3 and Erika Kellerhals at the time.

4 Q. (By Mr. Neiman:) Okay. I think my question
5 to you was did you stay out of it entirely?

6 A. I did. I did stay -- well, yes. The
7 answer is yes, I stayed out of it.

8 Q. All right. Let me show you a document
9 marked -- I will have the reporter mark as Exhibit 14.

10 (Deposition Exhibit No. 14 was
11 marked for identification.)

12 Q. (By Mr. Neiman:) And you will see that
13 Exhibit 14 is an email exchange involving Carol
14 Chapman, Percival Clouden and Jennifer Nugent-Hill.
15 Do you see that?

16 A. Yes.

17 Q. And Carol Chapman worked for the Economic
18 Development Authority, correct?

19 A. I don't know her.

20 Q. You don't know her. You know Percival
21 Clouden, though?

22 A. I do.

23 Q. He was who?

24 A. I think he was the executive director, I
25 think is the right term. Right. Yeah. I think it's

1 the right title.

2 Q. He was the executive director of the
3 Economic Development --

4 A. Yes.

5 Q. -- Agency?

6 A. Yes. I believe so, at the time.

7 Q. Okay. And Jennifer Nugent-Hill?

8 A. Honestly, I don't know what her title was.

9 Q. She also had a role with the Economic
10 Development?

11 A. But she worked there, yes.

12 Q. Okay. And let's take a look at
13 Ms. Chapman's email to Ms. Hill. In the middle of the
14 page she writes, "Hope you had a great Christmas and
15 birthday. The CEO called a few moments ago and asked
16 me to give you his best regards."

17 Do you remember who the CEO was?

18 A. No, I don't.

19 Q. Okay. All right. You certainly would have
20 known at the time who the CEO of the EDC was.

21 A. I don't recall.

22 Q. Okay. But I mean, you were a pretty senior
23 person --

24 A. Yeah.

25 Q. -- on the island with lots of contacts.

1 Did you know at the time, even if you can't remember
2 today who it was?

3 A. I would probably know then, yes.

4 Q. And you'll see that what Ms. Hill writes is
5 that, "The CEO called a few minutes ago, asked me to
6 give you his best regards."

7 And then it goes down to the next
8 paragraph, "He asked me to let you know he had a
9 call from the First Lady, and she has asked that
10 Epstein be on the board agenda at the public
11 hearing for the January 9th meeting."

12 Do you see that?

13 A. Yes.

14 Q. So, what Ms. Hill is relating is that you
15 had made a phone call to the CEO of the EDC, right?

16 A. Yes.

17 Q. Do you have any reason to dispute that?

18 A. Nope.

19 Q. Okay. And the purpose of your call was to
20 get an issue related to Mr. Epstein's certificate in
21 front of the agency, right?

22 MS. BOGGS: Objection. Mischaracterizes
23 this document.

24 THE WITNESS: The EDC was notoriously
25 always postponing, postponing, postponing.

1 And so I can only sitting here today assume
2 that either Erika Kellerhals or -- said, can
3 somebody please make a phone call to see if we
4 can get on somebody's agenda so we could get
5 this over with.

6 Q. (By Mr. Neiman:) And you made the call?

7 A. I made the call.

8 (Deposition Exhibit No. 15 was
9 marked for identification.)

10 Q. (By Mr. Neiman:) All right. Let's take a
11 look now at -- all right. Ms. de Jongh, I'm handing
12 you a document marked Exhibit 15.

13 And Exhibit 15 is a 2010 email exchange
14 between you and Jeffrey Epstein.

15 Do you see that?

16 A. Yes, I do.

17 Q. And at the bottom of the page, Mr. Epstein
18 is asking you who is in charge of Customs in the
19 Virgin Islands.

20 Do you see that?

21 A. Yes.

22 Q. And am I correct that although the Virgin
23 Islands is part of the United States, it's not part of
24 the United States. It's customs zone.

25 A. Correct.

1 Q. And that means that even if you're coming
2 from the United States and going back to the United
3 States, you have to clear Customs before you get on a
4 plane and go back to the United States.

5 A. Correct.

6 Q. And so if Mr. Epstein had guests with him
7 and they were flying on his plane back to the United
8 States, they'd have to go through Customs before they
9 left?

10 A. Correct.

11 Q. So Customs would see whoever was with
12 Mr. Epstein on his plane?

13 MR. TEAGUE: Objection, form. You could
14 answer.

15 THE WITNESS: I would -- I guess I would
16 assume so. I mean, I never been on his plane,
17 so I don't know.

18 Q. (By Mr. Neiman:) Sure. But according to
19 how the rules work, that's how it would work?

20 A. I mean, whenever I leave here I have to go
21 through customs.

22 Q. Okay. And Mr. Epstein is writing to you
23 and asking you who was in charge of customs for the
24 Virgin Islands?

25 A. Eh-hmm.

1 MR. TEAGUE: You to answer out loud.

2 THE WITNESS: I'm sorry, yes.

3 Q. (By Mr. Neiman:) Okay. I'm sorry. And
4 that's a federal official?

5 A. Yes.

6 Q. Okay. And he writes, "I used to have great
7 relationship with Gloria Lambert, the airport
8 supervisor."

9 Do you know who Gloria Lambert is?

10 A. No, I do not.

11 Q. Okay. And he writes, "I would like to know
12 who is now in her place or her boss with Kenn Hobson
13 now." Do you see that?

14 A. I see that.

15 Q. "There is a Mr. Carpenter who has been
16 difficult lately; not sure why."

17 Do you know who Mr. Carpenter was?

18 A. I do not.

19 Q. Okay. And then you write back on this
20 request from Mr. Epstein to find out whose running
21 Customs in the Virgin Islands. You say, "I spoke to
22 Kenn." Do you see that?

23 A. Yes.

24 Q. So Mr. Epstein had this question about who
25 is running Customs and wondered whether Kenn Hobson

1 would know. And you followed up with Kenn Hobson?

2 A. Correct.

3 Q. And Kenn Hobson was running the Port
4 Authority at the time?

5 A. Correct.

6 Q. And the Port Authority would have
7 interactions with Customs?

8 A. I would assume, yeah, they would.

9 Q. Right. And in fact, Mr. -- when you --
10 withdrawn.

11 When you spoke to Mr. Hobson, he told
12 you who was running customs in the Virgin Islands,
13 this Mr. Harrigan, right?

14 A. Yes.

15 Q. And then you forwarded that information on
16 to Mr. Epstein. Do you see that?

17 A. Yes.

18 Q. And do you know anything about what the
19 nature of Mr. Epstein's relationship was with
20 Mr. Harrigan?

21 A. I do not.

22 Q. Do you know whether Mr. Epstein gave gifts
23 to the folks at Customs?

24 A. I am not aware. I was not involved. I
25 know that -- I think he asked me once about my

1 thoughts of giving turkeys or something, but other
2 than that.

3 Q. Okay. You remember Mr. Epstein asked you
4 if you thought it was okay for him to give a turkey to
5 all the people who work at Customs at the airport --

6 A. I vaguely remember that.

7 Q. -- people who would see who was on his
8 airplane?

9 A. Yeah. I vaguely remember that, yes.

10 Q. And you said that was okay?

11 A. Yeah. I mean --

12 Q. Did you check with anyone first before you
13 gave that advice?

14 A. Well, down here, people usually give gifts
15 to people at Department of Finance, they give, you
16 know, they give gifts to people who they normally
17 interact with on a regular basis.

18 You know, it's similar to, you know,
19 when, you know, my brother-in-law lives in a building
20 where everybody gives a gift to the doorman, you
21 know. So that's where I was thinking, I had no
22 reason to think anything untoward was happening.

23 Q. Sure. But you would recognize that Customs
24 officials are not like the doorman in your building.
25 They are law enforcement officers, right?

1 A. Correct. But --

2 Q. And so my question to you was did you check
3 with anyone before you told Mr. Epstein it was okay to
4 give this gift to the Customs official who could see
5 who was on his plane?

6 A. Well --

7 MR. TEAGUE: Objection to form. You can
8 answer.

9 THE WITNESS: No, I didn't check with
10 anyone, but it doesn't matter whether I
11 checked with anybody or not. It was his
12 decision whether he wanted to do that or not.
13 It wasn't my say-so.

14 Q. (By Mr. Neiman:) Okay. But you thought it
15 was okay?

16 A. I just said, okay, if that's what you want
17 to do.

18 Q. Did Mr. Epstein have relationships with
19 other governors besides your husband?

20 MS. BOGGS: Objection, vague.

21 MR. TEAGUE: Objection, form.

22 Mischaracterization. You can answer.

23 THE WITNESS: Yes.

24 Q. (By Mr. Neiman:) Which other governors did
25 Mr. Epstein have relationships with?

1 A. Governor Mapp and Governor Bryan.

2 THE REPORTER: With who?

3 THE WITNESS: Bryan.

4 Q. (By Mr. Neiman:) What was the nature of
5 Mr. Epstein's relationship with Governor Mapp as you
6 perceived it?

7 A. Well, Governor Mapp was not a friend of
8 mine.

9 Q. Okay.

10 A. And which reason I am pretty sure you are
11 aware. But I was just aware of the fact that he
12 visited the island a few times, and that -- I think
13 that I was cc'd on a few emails of schedules of
14 meetings and things like that. But I was never
15 involved in any meetings, never, you know,
16 participated in any of the meetings, and I never knew
17 whatever it is they talked about.

18 I do know that -- and I don't know the
19 dates. I could only say that it's -- I think Mapp
20 got into office in 2015 and he was out in 2018. That
21 Mr. Epstein visited him at Government House once, but
22 I don't know when. So that's the nature.

23 Q. Okay. And you said that Governor Mapp was
24 not a friend and that I would know why. What were you
25 referring to?

1 A. Well, the fact that shortly after my
2 husband left office he had him arrested.

3 THE REPORTER: I'm sorry.

4 THE WITNESS: He had him arrested.

5 Q. (By Mr. Neiman:) For what?

6 A. Because we decided not to live in
7 Catherineberg because it was mold infested and I
8 didn't want my children living there. So we decided
9 to live in our own home.

10 And they put up a security -- a little
11 security house and a fence, and got the funding
12 through -- they passed it through the legislature.
13 And for political reasons, people made hay of it.

14 And my husband, you know, three or four
15 years before he came out of office said, it's okay,
16 when we get out of office, I'll just pay everything
17 back, which we were in the process of doing, and
18 Governor Mapp decided that, I believe because he
19 never wanted my husband to ever run again decided to
20 arrest him.

21 Q. What happened?

22 A. And what happened was that they then said,
23 well, you don't want to go to jail, just pay all this
24 money, which was about a hundred and something
25 thousand dollars more than what we determined was the

1 depreciated value. And we had a certain -- date
2 certain that we had to pay it back.

3 Q. So what happened?

4 A. We paid it back.

5 Q. Where did you get the money to do that?

6 A. We got some money from my mother's trust
7 and Mr. Epstein called me up and said, "Is everything
8 okay, what's happening?" And I said this is the
9 position we're in, and we're going to refinance our
10 house for the rest of the money, but I don't think
11 that we're going to be able to do it in time.

12 So he offered to lend us the money,
13 which he did immediately. I asked him if we could
14 pay it back within three years, and he said, "No, you
15 have to pay it back within a year, with interest."
16 And so he did that and we paid it back.

17 Q. Okay. So about how much money did
18 Mr. Epstein loan you at this time?

19 A. 200,000.

20 Q. How did you pay it back?

21 A. We refinanced our house. We took out 150
22 -- we got -- we were able to get \$150,000 out. We
23 paid. And then I for -- I had to forego any bonuses.
24 And then the rest of it, we paid out of pocket.

25 Q. Okay. So a portion of the repayment was

1 foregoing bonuses you might otherwise have earned from
2 your job?

3 A. Well, it would be just give me the bonus
4 and I had to write a check and pay it back.

5 Q. Okay. About how much of the repayment came
6 from these bonuses?

7 A. 20,000.

8 Q. All right. How about Governor Bryan, what
9 was the relationship between Mr. Epstein and the
10 current governor?

11 A. I sort of had less knowledge of what was
12 going on there. Erika Kellerhals was close to
13 Governor Bryan. I mean, I've known Governor Bryan,
14 obviously, because he was commissioner of Labor under
15 my husband, and he sat on a committee that I ran.

16 THE REPORTER: That I --

17 THE WITNESS: Pardon.

18 THE REPORTER: It sat on a committee
19 that --

20 THE WITNESS: That I ran. Children's
21 Cabinet that I ran.

22 And -- but I knew that Erika Kellerhals
23 had arranged some meetings with him.

24 Q. (By Mr. Neiman:) Okay. Some meetings
25 between Mr. Epstein and Mr. Bryan?

1 A. Correct.

2 Q. What is this Children's Cabinet that you're
3 referring to?

4 A. It's something that other states had done
5 and we tried to replicate it here where we were --
6 you know, we have Department of Education, Department
7 of Labor, sort of heads of all the -- all the
8 departments -- not all departments, but departments
9 that deal with children. Police department. And we
10 would come together, like, every two months. And so
11 they'd help me with my book drives.

12 We did things, like, I would go to
13 department of -- the police department and talk to
14 the police about ADD and ADHD and how that affected
15 especially young boys, and that their acting out
16 wasn't necessarily something that they needed to get
17 arrested for, go to juvie, but to sensitize the
18 police on how to treat children with that, especially
19 because, you know, it was more prevalent, especially
20 with ADHD, more prevalent in boys.

21 We worked with the NEEKC Foundation on
22 early childhood education, and got implemented that
23 all the early childhood centers, one of our goals was
24 to make sure that every child caretaker, at least,
25 had a high school degree, and that they worked

1 towards an associate degree because, you know, in the
2 Virgin Islands, at the time that we -- you know, that
3 John got into office, it was felt that people would
4 focus more on education in high school years, and
5 that really what we should focus on is, the most
6 important thing was zero to five.

7 And that if we had a solid zero to five,
8 then those kids could learn anything anywhere. And
9 that we wanted to sort of flip the dynamic. And in
10 order to do that, we had to get everybody on board
11 for that.

12 So we held quite a few symposiums on
13 that, and in acting with the NEEKC Foundation. And
14 so those were some of our goals.

15 Q. Okay. And you were the chair of the
16 children's Cabinet?

17 A. Yes.

18 Q. And this was -- the other members of this
19 cabinet were senior government officials?

20 A. Correct.

21 Q. And then you ran it?

22 A. Yes.

23 Q. Okay. And that Children's Cabinet helped
24 to implement the government's policy?

25 A. Yes. Well, we tried to make sure that we

1 were in sync with government's policy.

2 THE REPORTER: I'm sorry, in sync?

3 THE WITNESS: In sync with the
4 government's policy.

5 Q. (By Mr. Neiman:) And as you were talking
6 sort of this focus on early childhood, that was an
7 example of kind of implementing what the government
8 wanted to do?

9 A. Correct.

10 Q. Okay. So, do you recall Mr. Epstein being
11 influential in who the current governor appointed to
12 various positions?

13 MS. BOGGS: Objection, form.

14 THE WITNESS: Of him being influential?

15 Q. (By Mr. Neiman:) Yeah.

16 A. I would make some sort of recommendations
17 of, you know, who I thought would be good in terms
18 of -- because what he was -- seemed to be mainly
19 concerned about was being able to build whatever he
20 wanted to build on Little St. James. That was always
21 a point of contention for me and for Erika because,
22 you know, we never went over there. So he would
23 build whatever he would build. Some with permits;
24 some without.

25 DPNR would find out. They would get

1 upset. We'd say, you know, here we are again. He
2 would get fined, you know, we call it a NOVA, Notice
3 of Violation.

4 I think he was -- got a Notice of
5 Violation like three or four times under John's
6 administration. I don't know about under Mapp's
7 administration.

8 The other thing that was very important
9 to him was being able to get a hangar down at the --
10 at the airport.

11 He -- as I told you earlier I worked out
12 a lease which took two long years to get -- for his
13 helicopter, and then he subsequently wanted to be
14 able to get a lease, or have a hangar built for his
15 plane.

16 Q. Okay. So he cared who was running the Port
17 Authority?

18 A. Because he wanted to be able to build a
19 hangar.

20 Q. All right. And you remember enlisting
21 Mr. Epstein to support a particular candidate to
22 become the head of the Port Authority?

23 A. Yes.

24 Q. Tell me about that.

25 A. Just, he seemed to have the ear of Albert

1 Bryan.

2 Q. Who seemed to have the ear?

3 A. Jeffrey Epstein.

4 Q. Eh-hmm.

5 A. And so I just said, you know, that Carlton
6 Dowe would probably be, you know, best for you in
7 terms of being able to get the hangar that you want.

8 Q. Okay. And you say that Jeffrey Epstein
9 seemed to have the work of -- the ear, right --
10 withdrawn.

11 Let me start again.

12 You said that Jeffrey Epstein seemed to
13 have the ear of Governor Bryan. What did you mean
14 by that?

15 A. Well, he -- I knew that -- I knew that
16 they spoke. And when Governor Bryan was setting up
17 his cabinet, and I knew that -- I knew that Carlton
18 Dowe wanted -- I think he was there before, Mapp let
19 him go, and he wanted to go back. And I thought he
20 did a brilliant job when he was there before, and he
21 would probably do a brilliant job again. And that he
22 would probably -- you know, he seemed to be more
23 business friendly rather than status quo.

24 When he was there before, he'd, you
25 know, put in all these beautiful palm trees and

1 certainly made, you know, just made the place look
2 welcoming.

3 And, you know, right now he's, you know,
4 putting in new parking, it's -- you know, it's going
5 well. And so I just thought, you know, this is
6 probably the guy that you would want to talk to to be
7 able to build a hangar.

8 Q. And so you suggested to Mr. Epstein that he
9 talk to Governor Bryan about appointing Mr. Dowe?

10 A. Yeah.

11 Q. Because you thought that Mr. Epstein might
12 be able to be helpful in getting Mr. Dowe appointed?

13 A. Yeah. Yes.

14 Q. Okay. And Mr. Epstein agreed to do that?

15 A. Yes.

16 Q. And he spoke to the governor about it?

17 A. That I don't know. He didn't -- he -- he
18 rarely ever came back -- circled back to me and told
19 me what he spoke about.

20 Q. Got it. Okay. So let's take a look at
21 what we will mark Exhibit 16.

22 (Deposition Exhibit No. 16 was
23 marked for identification.)

24 Q. (By Mr. Neiman:) Exhibit 16 is a 2018
25 email exchange between you and Jeffrey Epstein,

1 A. Well, yeah, I know that Carlton had been
2 appointed.

3 Q. Do you remember --

4 A. I do recall that one of the reasons why it
5 was necessary to do -- well, we felt it was necessary
6 to do that is because Erika Kellerhals was,
7 obviously, Mr. Epstein's attorney, and Mr. Epstein
8 told me that she was dead set against Mr. Dowe
9 being -- going back to the Port Authority. And so
10 that was why we -- you know, why I said, hey, if you
11 can give him a good word, give him a good word,
12 because I know that Erika Kellerhals was saying
13 something else.

14 Q. Got it. So this was a situation where it
15 was not a sure thing that Mr. Dowe would get this job?

16 A. Yeah.

17 Q. Correct?

18 A. Correct.

19 Q. And you thought Mr. Epstein could be
20 influential in getting him the job?

21 A. Well, I knew that he listened a lot to
22 Erika.

23 Q. Who listened a lot to Erika?

24 A. Mr. Epstein.

25 Q. I see. So you were trying to persuade him

1 to back somebody that your thought Erika was trying to
2 persuade him not to back?

3 A. Right.

4 Q. I see.

5 A. It's a small island.

6 Q. Understood. Okay. Tell me who Celestino
7 White is?

8 A. He's a former senator here. I can't
9 remember how many terms. Maybe ten terms here.

10 Q. Okay.

11 A. And he became a consultant.

12 Q. Did he do work for Mr. Epstein?

13 A. He did.

14 Q. What was the nature of the work that
15 Celestino White did for Mr. Epstein?

16 A. He started out doing work for -- actually,
17 for Andrew Farkas. The second time that John -- that
18 my John ever met with Mr. Epstein was in 2014, I
19 think.

20 Mr. Farkas was very, very, very upset
21 and livid that when taxi drivers got picked up from
22 WICO dock, that they would completely bypass Yacht
23 Haven Grande and go straight to town.

24 And he had all these shops and every --
25 you know, invested all of this money. And also that

1 people.

2 Q. Okay. And that -- but Celestino White was
3 the specific recommendation of one person who might
4 fit that role?

5 A. Yes.

6 Q. And that Mr. Farkas and Mr. Epstein,
7 therefore -- thereafter, hired Mr. White?

8 A. Yes.

9 Q. Okay. Do you know how much they paid him?

10 A. No. That -- no, I don't.

11 Q. Does your husband have any kind of
12 financial relationship with Mr. White?

13 A. No.

14 Q. Do you have any kind of financial
15 relationship?

16 A. No, I do not.

17 Q. Okay.

18 A. But may I complete my --

19 Q. Sure. Go ahead.

20 A. So -- and then subsequent to that,
21 Mr. Epstein did hire Celestino White to -- he came up
22 with the idea that he wanted to change the name of
23 Little St. James to Little St. Jeff.

24 And he asked me, and I said I have no
25 clue how one would go about doing that. And so he

1 called up Celestino White and went and did a contract
2 with him. And Celestino presented something, and my
3 -- did my own --

4 THE REPORTER: I'm sorry.

5 THE WITNESS: Presented, did a -- did a
6 written proposal or something, and it kind of
7 died there.

8 Q. (By Mr. Neiman:) Okay. Did you ever
9 recommend Celestine White to Mr. Epstein?

10 A. I think might I have recommended it for
11 the Little St. Jeff thing.

12 Q. For anything else?

13 A. Not that I can recall.

14 Q. Okay. Let's take a look at a couple of
15 documents. First, let me show you what 281.

16 I'm going to ask the reporter to mark as
17 page 18, a one-page document.

18 (Deposition Exhibit No. 18 was
19 marked for identification.)

20 Q. (By Mr. Neiman:) All right. And this is
21 an email from you to Mr. Epstein on February 11, 2015.
22 Do you see that?

23 A. Yes. This was Little St. Jeff.

24 Q. Let me just ask the questions so I make
25 sure I got it.

1 A. All right.

2 Q. So this is in February of 2015?

3 A. Yeah.

4 Q. And you're recommending to Mr. Epstein that
5 he put Celestino on what you call a monthly retainer,
6 correct?

7 A. Eh-hmm.

8 Q. What did you mean by that?

9 MR. TEAGUE: You have to answer out
10 loud.

11 THE WITNESS: I'm sorry, yes.

12 Q. (By Mr. Neiman:) What did you mean by a
13 monthly retainer in this context?

14 A. Because I knew Celestino wouldn't do
15 anything for cheap.

16 Q. Okay. What do you mean by that?

17 A. I just knew he wouldn't, you know -- if
18 you paid him \$2,000, he would be, like, he's not
19 going to do anything much, but, you know, that's --
20 and when he wanted to do Little St. Jeff, this is
21 probably the person that you -- and, you know, the
22 one thing that I knew, if you wanted to change a name
23 you have to go to the legislature to do that.

24 And I am just said, I'm not the person
25 to go down to the legislature to convince somebody to

1 change the name an island.

2 Q. I got it. And you write that after you say
3 you should consider putting Celestino on some sort of
4 monthly retainer, you write, "That will get you his
5 loyalty and access." Do you see that?

6 A. Eh-hmm. Well, he is a consultant.

7 Q. So what did you mean his loyalty and
8 access?

9 A. Usually when you pay people -- you know, I
10 mean -- I don't know. I don't know why I said that.
11 Just that he would -- he would be responsive to you.
12 He would -- he would, you know, make you a priority.

13 Q. All right. Do you remember Celestino doing
14 any other work besides the Little St. Jeff work?

15 A. He may have, but I don't recall.

16 Q. Okay. Let me show you a document marked
17 Exhibit 19.

18 (Deposition Exhibit No. 19 was
19 marked for identification.)

20 Q. (By Mr. Neiman:) Do you recognize
21 Exhibit 19 as an email exchange between you and
22 Mr. Epstein in August of 2015?

23 A. I don't even know what this is referring
24 to.

25 Q. Well, you see that the subject is --

1 You see that?

2 A. Yes.

3 Q. That was true, right?

4 A. I was for a period of time, yes.

5 Q. And it also says he pays for the education
6 of the governor's children at the exclusive Antilles
7 School on St. Thomas. That was true also?

8 A. He paid for my children and everybody
9 else's children, yes.

10 Q. Well, when you say everybody else's
11 children, you mean other employees of FTC?

12 A. Correct. And other EDC companies, that is
13 normal par for the course for other EDCs to pay for
14 their children. It was normal and customary.

15 Q. Okay.

16 A. We were not special.

17 Q. Okay. And you see down at the bottom of
18 the page, and this is good classic New York Post
19 speak, it says in the last paragraph, "de Jongh's
20 flack didn't return our call."

21 Do you see that?

22 A. Eh-hmm.

23 Q. Do you remember hearing that the New York
24 Post was covering this issue?

25 A. I don't read the Post. Sorry.

1 (Deposition Exhibit No. 26 was
2 marked for identification.)

3 Q. (By Mr. Neiman:) Okay. Let's take a look
4 now at Exhibit 26. You see at the bottom of the page,
5 Mr. Epstein writes back to you, "I can enroll [REDACTED],
6 [REDACTED] if that helps the school." Do you
7 see that?

8 A. Eh-hmm.

9 Q. So he's now identified a third person with
10 an Eastern European name who could benefit from
11 English as a second language classes, right?

12 MR. TEAGUE: Objection, form. You could
13 answer.

14 THE WITNESS: Yes, those three names
15 were there.

16 Q. (By Mr. Neiman:) Okay. Did it ever cross
17 your mind to wonder whether there was something wrong
18 with this convicted sex offender telling you I have
19 three women who I'd like to help learn to speak
20 English?

21 MS. BOGGS: Objection, vague,
22 argumentative.

23 THE WITNESS: This is -- this is a
24 person who had one offense, had to register as
25 a sex offender. Didn't see him with any --

1 (Deposition Exhibit No. 35 was
2 marked for identification.)

3 Q. (By Mr. Neiman:) Ms. de Jongh, this is an
4 email exchange between you and Jeffrey Epstein in
5 September of 2015. Do you see that?

6 A. Yes.

7 Q. All right. Looking at the email at the
8 bottom of the page from Mr. Epstein to you, he writes,
9 "I will play any role in this you guys like. I could
10 lend John the money so he immediately has it. I would
11 gladly be on the phone (anonymous) with John Quinn and
12 the prosecutor offering suggestions. 25 a year for 20
13 yours, 490 now, with an income tax for the full
14 amount. 250 now and 250 in 15 years, et cetera."

15 What's going on here?

16 A. That's the note that I told you about when
17 John got arrested, with Mapp.

18 Q. Ah.

19 A. So it is not John Quinn. It is John and
20 Quinn. It's Mike Quinn, John's attorney.

21 Q. Ah.

22 A. So he just didn't put a comma, I guess.

23 Q. Got it. And this reference to 25 a year
24 for 20 years, 490 now with an income tax credit for
25 the full amount, 250 now and 250 in 15 years, what's

1 that talking about?

2 A. I actually never knew what he meant by
3 that because it was just, you know, we needed like
4 400,000, or a little shy of 400,000.

5 So I just said I would, you know,
6 discuss it with John. You know, he wanted, you know,
7 to see if we wanted him -- if we wanted him to pay
8 for our legal fees, and we said, no, we got that
9 covered.

10 It was just the issue of the Mapp
11 administration at the time trying to squeeze us to
12 pay immediately or go to jail, which we thought
13 seemed, you know, if it's a criminal offense, why ask
14 us for money, you know. So --

15 Q. And Mr. Epstein was giving some advice
16 about how to handle this criminal problem?

17 A. His advice was, don't go to court, just
18 pay the money.

19 Q. Okay. And -- but he is offering here some
20 various proposed structures for how to pay. Is that
21 fair?

22 A. That's fair.

23 Q. And one of them was to pay 490,000 now, but
24 get an income tax credit for the full amount?

25 A. Yeah.

1 Q. And to do that as a convicted felon, he
2 needed to get his supervision moved from Florida to
3 the Virgin Islands, right?

4 A. Correct.

5 Q. And you were passing on information related
6 to that to the governor and the attorney general of
7 the Virgin Islands.

8 A. About how to go about -- how one would go
9 about doing that.

10 Q. Right. And then you spoke to your husband
11 about it?

12 A. Yes.

13 Q. And got some advice about what the best way
14 it was to proceed, right?

15 A. Yes. Like who -- who would you talk to to
16 get this done.

17 Q. Did you also talk to the attorney general
18 about it?

19 A. I didn't speak directly to Vincent.

20 THE REPORTER: Sorry, I couldn't --

21 THE WITNESS: I don't -- I don't believe
22 I talked directly to Vincent about it.

23 Q. (By Mr. Neiman:) So your husband talked to
24 the attorney general?

25 A. I think he did.

1 Q. And then relayed to you this information
2 that you've set out in your email to Mr. Epstein?

3 A. Yeah. What he needed to do in order to
4 get transferred here.

5 Q. So you, the attorney general, and the
6 governor are together helping Mr. Epstein sort through
7 how he can transfer supervision from Florida to the
8 Virgin Islands?

9 A. How to legally get transferred here, yes.

10 Q. Okay. All right.

11 A. You mentioned that he was in jail at this
12 time?

13 Q. Eh-hmm.

14 A. I don't -- I think he was on work release.
15 He was -- I never spoke to him once he was in jail.

16 Q. Okay. But he was -- withdrawn. Do you
17 remember him being on work release in the daytime and
18 then going to jail at night?

19 A. I didn't -- I never knew his schedule.

20 Q. Okay.

21 A. I just know that I hadn't spoken to him
22 the whole time that he was incarcerated or in -- even
23 on work release.

24 Q. Okay. But at some point in 2009 you were
25 speaking to him about getting his future supervision

1 transferred?

2 A. Emailing, yeah.

3 Q. Well, emailing, but he says at the
4 beginning of the email, "Call me when you get a
5 chance," right?

6 A. Right. And usually I would call, like,
7 Lesley Groth and she would --

8 THE REPORTER: Who?

9 THE WITNESS: Lesley Groff. Because
10 tens out of -- ten times out of ten I wouldn't
11 have a number for him.

12 Q. (By Mr. Neiman:) So you would call Lesley
13 and she could reach him?

14 A. And she would patch me in to him.

15 Q. Got it. Okay. All right. Let's talk
16 about a topic we touched on earlier today which is the
17 sex offender registry.

18 A. Eh-hmm.

19 Q. Do you recall discussing the topic of the
20 sex offender registry as it related to Mr. Epstein
21 with your husband?

22 A. Yes.

23 Q. Who else did you talk about that topic
24 besides the governor?

25 A. Just the governor.

1 Q. You never talked to the attorney general
2 about that topic?

3 A. No, he talked to the attorney general
4 about the topic.

5 Q. Okay. Tell me what he told you about his
6 conversations with the attorney general on that topic?

7 A. Just that -- I asked him -- let me start
8 backwards?

9 Q. Sure.

10 A. Darren and Erika alerted me that, you
11 know, all the states and the territories had to come
12 up with their own SORNA laws, and there was money
13 attached to it and this was coming down the pike for
14 the Virgin Islands.

15 Darren then said, you know, hey, I read
16 through everything, and this particular portion is
17 going to work for Mr. Epstein because he's got a, you
18 know, private plane, whatever, and he would like the
19 notice to be shorter. How do we go about doing that?

20 I talked to John about that. He says,
21 well, have whoever -- whoever Epstein's lawyer is
22 talk to the attorney general. And I believe at the
23 time they asked Maria Hodge to do that in conjunction
24 with Darren and also Erika Kellerhals.

25 Q. Okay. And there was kind of a back and

1 A. Through his attorney, Maria Hodge, yes.

2 Q. And they've reached agreement with his
3 attorneys on what that legislation should look like,
4 correct?

5 A. Eh-hmm.

6 Q. Yes?

7 A. Yes.

8 MS. BOGGS: Objection, form.

9 Q. (By Mr. Neiman:) And the attorney general
10 endorsed the version that reflected the input of
11 Mr. Epstein and his lawyers, correct?

12 MS. BOGGS: Objection to form.

13 THE WITNESS: It appears so, yes.

14 Q. (By Mr. Neiman:) And then there was a state
15 senator who needed to weigh in, correct?

16 A. Correct.

17 Q. That's Mr. Russell?

18 A. Correct.

19 Q. Is that a first name or last name?

20 A. Senator Russell.

21 Q. Senator Russell. He's the senate
22 president?

23 A. I think he was the senate president at the
24 time, yes.

25 Q. Yeah. And you report in your email that

1 Senator Russell said this morning that he would accept
2 the amendments and introduce them tomorrow. Do you
3 see that?

4 A. Yes.

5 Q. How did you know that?

6 A. I think I called him and I asked him if he
7 got everything -- if he got this, and he said, yeah,
8 yeah. And now I can't remember whether I called him
9 or I saw him at the seaplane shuttle or something,
10 and I brought it up and he said, oh, yeah, I saw
11 everything and it's fine with me.

12 Q. Got it. So you had a conversation, a
13 direct one-on-one conversation with Senator Russell
14 where he confirmed that he was okay with the version
15 that had been worked out between the attorney
16 general's office and Mr. Epstein's lawyers?

17 A. Yeah. I told him that Maria Hodge wrote
18 something that was amending it, and that -- and he
19 said as long as the AG was fine with it. I said, it
20 appears that he is, and he said, okay, well, let's
21 bring it to the senate floor.

22 Q. And there came a time when Senator Russell
23 changed his mind?

24 A. Yeah. He had no intention of making any
25 changes.

1 Q. Or he did something that was different from
2 what he told you, is that fair?

3 A. It was par for his course.

4 Q. Okay. But am I correct that he told you
5 one thing and then did something else?

6 A. Correct.

7 Q. And what he told you was he was okay with
8 what had been worked out between the attorney general
9 and Mr. Epstein, correct?

10 A. In retrospect at the time, I realized that
11 he probably read anything. He was just like, yeah,
12 yeah, yeah. And then when it came down to the senate
13 and he did read it, he was he just wanted to go back
14 to the way it was before.

15 Q. Which --

16 A. And also I don't think the AG really
17 pushed it either.

18 Q. Do you know that or you're guessing?

19 A. No. I'm pretty sure that the AG did not
20 push it either.

21 Q. How do you know that?

22 A. I just remember that, that he was not --
23 you know, he was fine either way, that if -- if -- if
24 it went as original, he was fine with it.

25 Q. Got it.

1 A. That we shouldn't make -- necessarily make
2 any special arrangements for anyone.

3 Q. So there was a process of working out a
4 deal with the attorney general's office that the
5 attorney general signed off on, correct?

6 A. Eh-hmm.

7 Q. Yes?

8 A. Yes.

9 Q. But he didn't push for it with the
10 legislature. Is that what you're saying?

11 A. Correct.

12 Q. Okay. And then you write, you send all
13 this news to Mr. Epstein and say, "Please call me when
14 you have a moment." Do you see that?

15 A. Yes.

16 Q. Did you talk to Mr. Epstein about it?

17 A. I probably did and just told him what
18 happened.

19 Q. Okay. Let's take a look at -- do you
20 remember what his reaction was?

21 A. To this?

22 Q. Yeah.

23 A. I don't recall what his reaction was, no.

24 Q. Okay. Let's take a look at another
25 document which may help. 42.

1 off the improvements on the house, right?

2 A. Yes.

3 Q. Okay. So that's one example. Didn't you
4 also ask him to contribute to a reception for --

5 A. Yes.

6 Q. -- your husband?

7 A. Yes. You. You said campaign.

8 Q. Okay. I'm just asking the question.

9 A. I know. And I'm just answering the
10 question specifically what you're asking me.

11 Q. Well, you did ask him to raise money for a
12 political event, State of the Territory reception?

13 A. Yes.

14 Q. Okay. And Mr. Epstein contributed to that
15 event?

16 A. He did.

17 Q. How much did he give?

18 A. I do not recall.

19 Q. Okay. Let's take a look. 131.

20 (Deposition Exhibit No. 44 was
21 marked for identification.)

22 Q. (By Mr. Neiman:) 131 is an email exchange
23 between you and Mr. Epstein, Subject: Fundraising
24 Question. You see that?

25 A. Yes.

1 Q. And you indicate in your email to
2 Mr. Epstein at 10:51 a.m. on January 24th, 2014, that
3 you are fund raising for the governor's final State of
4 the Territory reception, correct?

5 A. Correct.

6 Q. That's a political event.

7 A. Yes.

8 Q. And you needed \$35,000 to fund that event?

9 A. Well, yeah, I needed 35,000, we had raised
10 15, and we wanted to match the other 15.

11 Q. All right. So you're asking him if he
12 would contribute \$15,000 to this political event?

13 A. Correct.

14 Q. For the benefit of your husband?

15 A. Yes.

16 Q. And Mr. Epstein agreed to do that?

17 A. Yes.

18 Q. Okay. And then let me show you next -- do
19 you recall asking Mr. Epstein to contribute to the
20 Democratic Party?

21 A. I may have. I don't -- you'd have to jog
22 my memory.

23 Q. Your husband was a Democrat, correct?

24 A. Yes.

25 Q. Okay. So he would benefit by raising more

1 funds for the Democratic Party, true?

2 A. Didn't seem to help him at the time, but,
3 yes.

4 Q. Okay. I'll ask the court reporter to mark
5 the next document, Exhibit 45.

6 (Deposition Exhibit No. 45 was
7 marked for identification.)

8 Q. (By Mr. Neiman:) Exhibit 45 is another
9 email exchange with Jeffrey Epstein, this one in
10 October 2014, correct?

11 A. Eh-hmm.

12 Q. And you asked Mr. Epstein in the middle of
13 the page, "How much would you like to give to the
14 St. Croix District Democratic Party?" Do you see
15 that?

16 A. Eh-hmm.

17 Q. And he says, "15K."

18 A. Yeah.

19 Q. Do you recall any other donations that
20 Mr. Epstein made to the Democratic party?

21 A. This one is not on behalf of John.

22 Q. Okay.

23 A. This is not solicited on behalf of John.

24 Q. Well, it's -- do you recall any other
25 contributions to the Democratic party that you asked

1 Mr. Epstein to make other than this one?

2 A. You'd have to refresh my memory. I'm sure
3 you have other emails, so refresh my memory.

4 Q. Do you recall asking him to contribute to
5 particular Democratic candidates?

6 A. Yeah, I always did.

7 Q. And how about Stacey Plaskett in
8 particular? Do you remember asking Mr. Epstein to
9 contribute to her campaign?

10 A. Yeah, I did.

11 Q. Why did you do that?

12 A. I liked her.

13 Q. All right. I'll show you another document
14 I'll ask the court reporter to mark Exhibit 46.

15 (Deposition Exhibit No. 46 was
16 marked for identification.)

17 Q. (By Mr. Neiman:) All right. This is an
18 email exchange between you and Jeffrey Epstein on June
19 19th, 2014, correct?

20 A. Yes.

21 Q. All right. And you told Mr. Epstein that
22 his help was needed to try to get Stacey Plaskett
23 elected to congress. Do you see that?

24 A. Eh-hmm.

25 Q. And you note that Shawn Malone, the current

1 Q. All right. And so you told Mr. Epstein
2 that Shawn needed to be defeated and that Stacey was a
3 friend, and asked if any of his friends would give to
4 her campaign.

5 Do you see that?

6 A. Eh-hmm.

7 Q. Why were you asking for contributions from
8 the friends instead of from Mr. Epstein personally?

9 A. Don't I ask him for it, too?

10 THE REPORTER: I'm sorry.

11 THE WITNESS: I said am I -- aren't I
12 asking him in this for him, too, to give?

13 Q. (By Mr. Neiman:) Do you read the sentence,
14 "Do you think any of your friends would give to her
15 campaign," as a request for Mr. Epstein to give?

16 A. I'm reading this as you, your friends.
17 That's how I'm reading this.

18 Q. So, you thought you were asking Mr. Epstein
19 in his email whether he or any of his friends --

20 A. Or any of his friends, yeah.

21 Q. Okay. Why were you asking him to give to
22 Ms. Plaskett if you didn't ask him to give to your
23 husband's campaign?

24 A. I just never -- I'm -- I was notoriously
25 bad about asking anybody for John's campaign.

1 against.

2 Q. Got it. And then Mr. Epstein writes back
3 to you, "I'm sure darren rich bella ana would."

4 Do you see that?

5 A. Yes.

6 Q. So he's identifying four employees of his
7 who he thought could give to the campaign, correct?

8 A. Yes.

9 Q. And you say, "Ok, should I ask them?" And
10 he said, "Yes, individually." Do you see that?

11 A. Yes.

12 Q. And did you go ask -- out and ask each of
13 them?

14 A. I think more than likely I did, yes.

15 Q. And when you did that, did you let them
16 know that, you know, Mr. Epstein wanted them to give?

17 A. Yeah.

18 Q. And that was, I take it -- you had to let
19 them know that so that they would do it.

20 A. I didn't want them to think it was me. It
21 is not something I am comfortable with, so it was
22 easier for me to say Mr. Epstein said.

23 Q. Understood. And were they all willing to
24 give once they heard that this is what Mr. Epstein
25 wanted?

1 A. Yeah.

2 Q. All right. Do you remember also asking
3 Mr. Epstein to give \$13,000 to the Democratic Party
4 for Ms. Plaskett's benefit?

5 A. Yes. I think that was on behalf of Erika
6 as well.

7 Q. Did he agree to do that?

8 A. I don't recall.

9 Q. All right.

10 A. What year was that?

11 Q. Do you recall in 2014 making that request?

12 A. No, I don't.

13 Q. All right. How about --

14 A. Oh, go ahead.

15 Q. I'm sorry, I didn't mean to cut you off.

16 A. That's fine.

17 Q. What were you going to say?

18 A. No, I just said I know that there was a
19 donation later than that that he made that was
20 rejected by the Democratic Party.

21 Q. When -- okay. I'm sorry.

22 THE WITNESS: Did you hear what he said?

23 THE REPORTER: Yes.

24 Q. (By Mr. Neiman:) Yeah. Okay. When did
25 you hear that?

1 A. I think that was -- trying to think of the
2 years that she ran. So she runs every two-years, so
3 it might have been 2018.

4 Q. Okay.

5 A. And --

6 Q. What did you hear?

7 A. I didn't know. I didn't know anything
8 about the payment, but then I heard in the office, it
9 was sort of a hubbub and Richard called down and was
10 like they're returning his money and then I think it
11 became a story.

12 And Rich said he got yelled at by
13 Jeffrey about, you know, why this money was sent, and
14 Jeanne Brennan, who worked in the office, said, you
15 know, Cecile, the instructions were explicitly said
16 to send the money to, you know, to this, so why is
17 everybody upset at me?

18 Q. Right.

19 A. And I said, I don't know. Sorry about
20 that, but, you know, they returned the money and that
21 was the end of it.

22 THE REPORTER: They were --

23 THE WITNESS: They returned the money
24 and that was the end of it.

25 Q. (By Mr. Neiman:) Did you have any

1 understanding as to why the Democratic party --

2 A. Yeah, because --

3 Q. I'm sorry, just let me finish the question.
4 Just so that she can do her job. That's all. I know
5 you anticipate what I'm asking you.

6 Did you have any understanding of what
7 the Democratic Party decided not to accept the
8 money from Mr. Epstein?

9 A. Because he was a registered sex offender.

10 Q. Did the fact that the Democratic Party
11 wouldn't take his money give you any concern about
12 whether you should continue?

13 A. Yes, I was concerned that they were
14 concerned, yeah.

15 Q. Did you do anything about it?

16 A. No, I didn't do anything about it.

17 Q. Do you remember Mr. Epstein donation
18 \$75,000 to a Super PAC for Mr. Mapp?

19 A. No -- yeah.

20 Q. Yeah?

21 A. I don't recall that.

22 Q. Okay. Let me show you a document which I
23 shall ask the reporter the mark as Exhibit 47.

24

25

1 (Deposition Exhibit No. 47 was
2 marked for identification.)

3 Q. (By Mr. Neiman:) All right. You see there
4 an email from Mr. Epstein to you in September of 2016
5 asking the check be prepared for Mr. Mapp's Super PAC
6 for \$75,000?

7 A. Yeah.

8 Q. You see that?

9 A. Eh-hmm.

10 Q. Do you remember what this Super PAC was?

11 A. I don't -- because I don't -- I don't cut
12 checks.

13 Q. Eh-hmm.

14 A. I think he -- I see Rich is on here. He's
15 got Governor Mapp on here. So Rich would have been
16 the one to cut the check.

17 Q. Got it. And so you're not sure who it was?

18 A. No, I wouldn't. I, in all honesty, wanted
19 to know as little as possible about Mapp as possible.

20 Q. Understood.

21 MR. TEAGUE: Could we take a break in
22 about five minutes? I need to take a restroom
23 break, too.

24 MR. NEIMAN: Absolutely.

25 Ask the reporter to mark this three-page

1 Internal Revenue, they would deem it as like a hotel
2 because he had so many buildings.

3 Q. Eh-hmm.

4 A. Separate buildings, and we had to convince
5 them that it wasn't -- it wasn't a hotel. And he --
6 and also he would bring in so many, like, tons of
7 furniture. Just a lot of supplies.

8 Q. Eh-hmm.

9 A. And so through Customs and excise or
10 whatever. And so they just kept saying, oh, this has
11 got to be a hotel, or a small boutique hotel. So
12 we'd always have to -- you know, Darren or Erika
13 would have to write a letter saying this not a hotel,
14 it's a home.

15 Q. Okay. Was part of what was raising all
16 those questions the number of people who were coming
17 to the island?

18 A. No. It had more to do with the fact that
19 why are you bringing in all this -- all this stuff
20 that comes through Tropical and has to be cleared
21 through Customs, all his trees, all his -- all
22 construction supply -- materials.

23 Q. Okay. Do you remember there being times
24 when the government of the Virgin Islands itself
25 turned to Mr. Epstein as a potential source of cash?

1 A. I vaguely remember him asking about
2 collateralization or something, but --

3 Q. What do you remember about that?

4 A. Just him asking if I could ask John about
5 how one goes about collateralizing a loan to the
6 government.

7 Q. So the idea was that Mr. Epstein could loan
8 the government of the Virgin Islands cash in exchange
9 for the government posting properties as security?

10 A. Yes. That's the gist of it, yes.

11 Are we done with this?

12 Q. Yeah. All right. So take a quick look at
13 this document, which we'll have the court reporter
14 mark as Exhibit 50.

15 (Deposition Exhibit No. 50 was
16 marked for identification.)

17 Q. (By Mr. Neiman:) So you'll see at the
18 bottom of the first page of Exhibit 50, there's an
19 email from Mr. Epstein to you that says the
20 government -- "The vi government is desperate for
21 cash." Do you see that?

22 A. Yes.

23 Q. And then he asks, "Does John know of any
24 asset they might have that I can use as collateral.
25 Islands, etc." Do you see that?

1 A. Yes.

2 Q. Where did Mr. Epstein get the idea that
3 Virgin Islands government was desperate for the cash?

4 A. It wasn't from my husband because my
5 husband was not governor at the time.

6 Q. Ah, this is after your husband left. Do --
7 do you have any idea where he got the idea that the
8 government was desperate for cash?

9 A. Well, do you want me to make an
10 assumption?

11 Q. Tell me what you think?

12 A. What I think is that he was probably
13 speaking to Governor Mapp, and Governor Mapp probably
14 said we only have X amount of money left in the
15 coffers to pay, you know, payroll, et cetera, and I
16 need -- we need cash. And --

17 MR. TEAGUE: I just want to object to
18 the extent that this calls for speculation.
19 But you can continue to answer.

20 Q. (By Mr. Neiman:) You can continue.

21 A. And, you know, he turned to Mr. Epstein
22 and said, you're a finance guy, you know, could you
23 help me out?

24 Q. The idea being maybe you, Mr. Epstein,
25 could loan me some money?

1 MR. TEAGUE: Same objection.

2 THE WITNESS: Sorry, I didn't mean to
3 shake my head. I am making that assumption,
4 yes.

5 Q. (By Mr. Neiman:) That's what you
6 understood from this email exchange you had with
7 Mr. Epstein?

8 A. Yes. Well, I didn't think that he'd want
9 to take property for \$50 million just for nothing.

10 THE REPORTER: He wouldn't --

11 THE WITNESS: He wouldn't want to
12 take -- wouldn't want to take property as
13 collateralization just for nothing. And he
14 starts out the email by saying the V.I.
15 government is desperate for cash.

16 Q. (By Mr. Neiman:) Right. So as you
17 understood it from your communications with
18 Mr. Epstein, the problem was that the government was
19 desperate for cash, correct?

20 A. Correct.

21 MS. BOGGS: Objection. Calls for
22 speculation.

23 Q. (By Mr. Neiman:) And as you understood from
24 your discussions with Mr. Epstein, the potential
25 solution was for Mr. Epstein to provide some cash in

1 exchange for islands as collateral?

2 A. Or land as collateral, yes.

3 Q. Okay. And being short of cash is kind of a
4 perpetual problem for the Virgin Islands government,
5 fair?

6 MS. BOGGS: Objection, speculation.

7 MR. TEAGUE: Same objection, form.

8 THE WITNESS: It was until about three
9 or four years ago, yes.

10 Q. (By Mr. Neiman:) What happened three or
11 four years ago?

12 A. COVID.

13 Q. Ah. And that was good for the Virgin
14 Islands?

15 A. Very good.

16 MR. TEAGUE: Objection, form.

17 THE WITNESS: Oh.

18 MR. TEAGUE: You can answer.

19 Q. (By Mr. Neiman:) You can answer.

20 A. Yes. Seemed very good, yes.

21 Q. Okay. Prior to COVID, for a long time the
22 Virgin Islands had been strapped for cash?

23 A. Well, since the --

24 MS. BOGGS: Objection. Speculation.

25 THE WITNESS: Since the financial crash